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Food and
Nutrition
Service

Park Office
Center

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SUBJECT: Supplemental Nutrition Assistance Program – Recertification Interview Scheduling

TO: Regional Directors
Supplemental Nutrition Assistance Program
All Regions

This memorandum clarifies Supplemental Nutrition Assistance Program (SNAP) policy regarding recertification interview scheduling.

Regulations at 7 CFR 273.14(b)(3)(iii) provide, “State agencies shall schedule interviews so that the household has at least 10 days after the interview in which to provide verification before the certification period expires.” The Food and Nutrition Service (FNS) has been asked if it is allowable to wait until the household submits a recertification form before scheduling a recertification interview; or, if in order to meet the requirement provided by 7 CFR 273.14(b)(3)(iii), States must schedule an interview regardless of whether or not a recertification form is received.

This memo clarifies that States are not required to schedule an interview before receiving a recertification form from the client. Rather, the State has some flexibility regarding whether to schedule the interview before or after receiving the recertification form from the client, so long as the State complies with all other relevant recertification requirements. This flexibility is consistent with regulations at 7 CFR 273.14 which lay out SNAP policy regarding recertification.

While States have flexibility in this area, Federal regulations and FNS best practices encourage States to send an interview appointment letter for in-person or telephone interviews with the Notice of Expiration (NOE). Scheduling the interview early in the recertification process provides the State and the client greater opportunity to ensure all Federal requirements are met when determining the household’s continued eligibility. Providing an interview appointment with the NOE promotes efficiency and reduces the administrative burden on the State and client.

Historical Context

Previously, it was typical for a State agency to require a household to submit an application for recertification before scheduling an interview.

In recent years, technology and business processes innovations, including the use of call centers, have allowed States more options to serve households, while continuing to meet Federal requirements. Many States have adopted streamlined procedures, including interactive applications that combine the act of re-applying with the interview or offer on-demand interviews. While many States have moved away from requiring a household to submit an application for recertification before scheduling the interview, it is still allowable under the law.

Interview Scheduling Policy

States must comply with Federal requirements regarding the recertification process, including the requirements that the State must provide the household:

- 15 days from the date the NOE is received to file a timely application for recertification, per 7 CFR 273.14(c);
- 10 days after the interview in which to provide verification before the certification period expires, per 7 CFR 273.14(b)(3)(iii); and
- Notice of required verification and the date by which verification must be satisfied, per 7 CFR 273.14(b)(4).

The regulations also provide that, “Any household whose eligibility is not determined by the end of its current certification period due to the time period allowed for submitting any missing verification shall receive an opportunity to participate, if eligible, within 5 working days after the household submits the missing verification and benefits cannot be prorated.” (See 273.14(d).)

To meet these requirements, a State must send out the NOE with sufficient time to allow for the household to have 15 days to file a recertification form, interview scheduling, and the 10-day timeframe after the interview in which to provide verification. States need not schedule interviews in advance of receiving the recertification form from the household in order to meet these requirements.

Regulations at 7 CFR 273.14(b)(1)(iii) provide that “(t)o expedite the recertification process, State agencies are encouraged to send a recertification form, an interview appointment letter that allows for either in-person or telephone interviews, and a statement of needed verification required by §273.2(c)(5) with the NOE.”

Thus, in the interest of expediency, Federal regulations highly encourage, but do not require, States to schedule the recertification interview in advance of receiving a completed application package.

Best Practices

States wishing to maximize efficiency and streamline administrative burdens should seriously consider sending an interview appointment letter with the NOE, rather than waiting until after a completed form has been received.

For those States that schedule the interview only after receiving the recertification form, FNS strongly encourages the State to attempt contact with the household in order to provide a final reminder that benefits will end unless the household takes the required action. This may help more eligible households recertify instead of filing a new application after termination.

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FNS is available to provide technical assistance to State agencies to help ensure that their process is efficient and effective in meeting Federal requirements, upholds program access, and provides good stewardship of program resources. For additional questions, please contact Sasha Gersten-Paal at sasha.gersten-paal@fns.usda.gov.

A handwritten signature in black ink, appearing to read "Lizbeth Silberman", with a long horizontal flourish extending to the right.

Lizbeth Silberman
Director
Program Development Division